

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RECEIVED

2007 OCT 19 P 1:41

LUCILLE HALL  
Pro Se Litigant,

v.  
GENPAK, L.L.C.,  
Defendant

CIVIL ACTION NO.: 2:06CV 946-MHT(WO)

CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

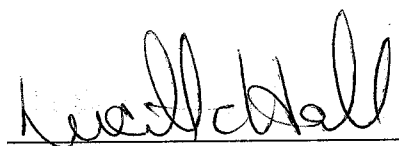
ANSWER TO MOTION TO DISMISS

Comes now Pro Se, Lucille Hall to answer per Honorable Judge Walkers request as to why I didn't answer to the HIPPA request in a timely manner Honorable Judge , I DID ON OCTOBER 2,2007 I FAXED A COPY TO THE DEFENDANT'S OFFICE AND ON OCTOBER 3, 2007 I MAILED THE ORIGINAL SIGNED COPY TO THEM from **LAGOON PARK STATION 36121(POST OFFICE)** at **GEORGE TODD DR here IN MONTGOMERY**. That very same time I bought some 2 cent stamps to add to my 39 cent stamp for proper postage. The defendant office is mistaken when stating that I did not honor your request judge for Maam, I MOST CERTAINLY DID ANSWER WITHIN THE TIME FRAME. Further more the defendant's paralegal left messages to contact her concerning the release a few days before the release deadline. When I did she wasn't available nor was attorney Robin Adams, therefore I left messages on their answering machine PLUS I left a message with their operator to the effect that I had faxed a copy of the release on October 2,2007 and have already mailed them the original on the 3rd. If they need anything else call me when they get in. I didn't hear from them so naturally I assume they had received them until I received a letter from the District Court concerning the defendant's motion request to dismiss under default to comply with Judge Susan Walkers order. Again Maam, I did not fail to reply and here are my fax records and signed a copy of the signed releases. I plea that you please continue with the case because nothing in my past that CHRIST has forgiven me for that MAN can make me cry over anymore.

**CERTIFICATE OF SERVICE**

I, Lucille Hall, hereby certify that on OCTOBER 19, 2007, a copy of the foregoing was served by U.S Postal service or Faxed to:

MAYNARD, COOPER & GALE P.C.  
Attention: Robin Adams and David M. Smith  
2400 AmSouth/Harbert Plaza  
1901 Sixth Avenue North  
Birmingham, Alabama 35203  
(205) 254-1000

  
PRO SE 10/19/07  
12:25 PM

6124 Fuller Rd  
Montgomery AL 36110  
(334) 272-0033  
328 8581 cell

TRANSMISSION VERIFICATION REPORT

TIME : 10/19/2007 12:28  
NAME : GUNTERLIBRARY  
FAX : 3344162949  
TEL : 3344162949  
SER.# : BROF3J449455

DATE, TIME	10/19 12:27
FAX NO./NAME	9812052541999
DURATION	00:01:20
PAGE(S)	06
	COVERPAGE
RESULT	OK
MODE	STANDARD
	ECM

TRANSMISSION VERIFICATION REPORT

TIME : 10/02/2007 15:27  
NAME : GUNTERLIBRARY  
FAX : 3344162949  
TEL : 3344162949  
SER.# : BROF3J449455

DATE, TIME	10/02 15:26
FAX NO./NAME	9812052541999
DURATION	00:00:49
PAGE(S)	03
RESULT	COVERPAGE
MODE	OK
	STANDARD
	ECM

**MAYNARD COOPER  
& GALE PC**  
ATTORNEYS AT LAW

Robin A. Adams  
DIRECT: (205) 254-1105  
EMAIL: radams@maynardcooper.com

September 6, 2007

**VIA FEDERAL EXPRESS**

Lucille Hall  
6124 Fuller Road  
Montgomery, AL 36110

Re: **Lucille Hall v. Genpak, LLC**  
**Civil Action No: 2:06 CV 946-MHT (WO)**

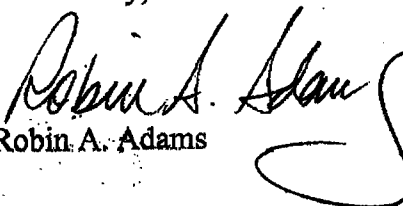
Dear Ms. Hall:

Enclosed, please find Releases for your records from Veteran's Affairs and your Air Force employment records. Please sign both of these Releases and return to me in the enclosed envelope, which is pre-addressed and stamped with sufficient postage.

We need these signed Releases back no later than September 14, 2007. If you do not intend to sign and return these Releases, please let me know before that time so that we can file an appropriate motion with the Court.

Please call me if you have any questions or concerns regarding this request.

Yours truly,

  
Robin A. Adams

RAA/dsl  
Enclosures

cc: David M. Smith, Esq.  
Leah Burrus

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

LUCILLE HALL,

Plaintiff,

v.

GENPAK, L.L.C.,

Defendant.

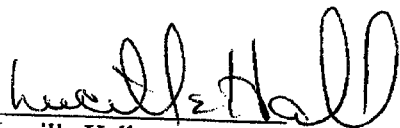
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) CIVIL ACTION NO.  
) 2:06 CV 946-MHT (WO)  
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**AUTHORIZATION FOR THE RELEASE OF PERSONNEL RECORDS**

I, Lucille Hall, date of birth: 2/13/1967; social security number: 417-15-5899, hereby authorize attorney, Robin A. Adams, Maynard Cooper & Gale, P.C., 1901 6<sup>th</sup> Avenue North, Suite 2400, Birmingham, AL 35203, to obtain any and all personnel records, including, but not limited to, employee's personnel file, applications for employment, state and federal income tax withholding forms, payroll records, evaluations, disciplinary action records, insurance and benefit records, 401K information and correspondence files which I may have with THE DEPARTMENT OF THE AIR FORCE/HEADQUARTERS AIR FORCE PERSONNEL CENTER, and said records may be directly released to them.

I hereby release THE DEPARTMENT OF THE AIR FORCE/HEADQUARTERS AIR FORCE PERSONNEL CENTER from any liability for said release of records to said attorney.

Dated this 30 day of September 2007.

  
Lucille Hall

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

LUCILLE HALL,

Plaintiff,

v.

GENPAK, L.L.C.,

Defendant.


CIVIL ACTION NO.  
2:06 CV 946-MHT (WO)

**AUTHORIZATION FOR THE RELEASE OF MILITARY PERSONNEL RECORDS**

I, Lucille Hall, date of birth: 2/13/1967; social security number: 417-15-5899, hereby authorize attorney, Robin A. Adams, Maynard Cooper & Gale, P.C., 1901 6<sup>th</sup> Avenue North, Suite 2400, Birmingham, AL 35203, to obtain any and all military personnel records, including, but not limited to, employee's personnel file, applications for employment, state and federal income tax withholding forms, payroll history, 401K information, evaluations, counseling, disciplinary action records, discharge summary, health and benefit records, and any correspondence files which I may have with the NATIONAL PERSONNEL RECORDS CENTER, and said records may be directly released to them.

I hereby release NATIONAL PERSONNEL RECORDS CENTER from any liability for said release of records to said attorney.

Dated this 30 day of September 2007.

  
Lucille Hall